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12 Attorneys for the United States

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,)
17 Plaintiff,)
18 v.)
19 JASMINE NICOLE BUTTS,)
20 Defendant.)

21 CRIMINAL NO. - 07 .. 70624

22 NOTICE OF PROCEEDINGS ON
23 OUT-OF-DISTRICT CRIMINAL
24 CHARGES PURSUANT TO RULES
25 5(c)(2) AND (3) OF THE FEDERAL RULES
26 OF CRIMINAL PROCEDURE

27 Please take notice pursuant to Rules 5(c)(2) and (3) of the Federal Rules of Criminal
28 Procedure that on October 23, 2007, the above-named defendant was arrested based upon an
arrest warrant (copy attached) issued upon an

XX Indictment

Information

Criminal Complaint

Other (describe) _____

pending in the Eastern District of California, Case Number 07-CR-0449-MCE.

1 In that case, the defendant is charged with violations of Title 18 United States Code, Sections
2 371, 1344(2) (5 counts), and 1028A(a)(1) (2 counts).

3 Description of Charges: Conspiracy to Commit Bank Fraud, Bank Fraud and Attempted Bank
4 Fraud, and Aggravated Identity Theft.

5
6 Respectfully Submitted,
7
8 SCOTT N. SCHOOLS
9 UNITED STATES ATTORNEY

10 Date: 10/24/07
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TAREK HELOU
Assistant U.S. Attorney

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2 United States Attorney
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3 501 I Street, Suite 10-100
3 Sacramento, California 95814
4 Telephone: (916) 554-2782

FILED

OCT - 4 2007

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY *[Signature]* DEPUTY CLERK

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8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

207-GR-11449 HCE

) CR. NO.

) VIOLATIONS: 18 U.S.C. § 371 ...
>) Conspiracy; 18 U.S.C. § 1344 (a)
>) - Bank Fraud and Attempted Bank
>) Fraud (5 Counts); 18 U.S.C. §
>) 1028A(a)(1) - Aggravated
>) Identity Theft. (2 Counts)

12 Plaintiff,

)

v.

)

14 JASMIN NICOLE BUTTS,
15 JASMINE CHANEL CARMICHAEL,
15 EBONY CROMWELL,
16 DARCELL EPPS, and
16 TIFFANY CHARANADA PIPPINS,

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I. INTRODUCTION

2 1. At all times relevant herein, the Wells Fargo Bank was a
3 financial institution, the accounts of which were insured by the Federal
4 Deposit Insurance Corporation.

II. THE CONSPIRACY

6 2. Beginning not later than May 29, 2007, and continuing until
7 or about August 8, 2007, in the State and Eastern District of California
8 and elsewhere, defendants JASMIN NICOLE BUTTS, JASMINE CHANEL
9 CARMICHAEL, EBONY CROMWELL, DARCELL EPPS, and TIFFANY CHARANADA PELTON,
10 did knowingly combine, conspire, confederate and agree with each other
11 and with others known and unknown to the Grand Jury, to: (a) execute
12 scheme and artifice to obtain the monies and funds owned by and under
13 the custody and control of a federally insured financial institution,
14 means of material false and fraudulent pretenses and representations,
15 violation of Title 18, United States Code, Section 1344(2); and (b)
16 possess and use, without lawful authority, a means of identification
17 another person, during and in relation to an act of bank fraud, in
18 violation of Title 18, United States Code, Section 1028A(a)(1).

III. MANNER AND MEANS

20 During and in furtherance of the conspiracy, defendants JASMIN
21 NICOLE BUTTS, JASMINE CHANEL CARMICHAEL, EBONY CROMWELL, DARCELL BROWN,
22 and TIFFANY CHARANADA PIPPINS, and others known and unknown to the Grand
23 Jury, employed among others the following manner and means:

24 3. Defendants BUTTS, CARMICHAEL, CROMWELL, EPPS and PIPPINS,
25 agreed to use and present for cash checks manufactured with stolen
26 identification information and financial institution information, to
27 obtain money and funds in the custody and control of Wells Fargo Bank.

4. An unknown co-conspirator of the defendants obtained

1 unauthorized access to names and other identification information and
2 financial institution information for select customers at Wells Fargo
3 Bank. With this access, the co-conspirator then changed the point of
4 contact phone numbers for such accounts in the databases of Wells Fargo
5 Bank, which numbers were used by Wells Fargo personnel to contact
6 account holders. One reason for contacting account holders was to
7 confirm the validity of personal checks written on the account in the amount
8 of \$1,000.00. The contact information was changed to telephone numbers
9 controlled by the defendants.

10 5. An unknown co-conspirator obtained stolen identification
11 information and financial institution information relating to select
12 customers of Wells Fargo Bank. Using that information, the co-
13 conspirator prepared checks with the stolen information and made them
14 payable to defendants CARMICHAEL, CROMWELL, EPPS, and PIPPINS.
15 Defendants CARMICHAEL, CROMWELL, EPPS, and PIPPINS were persons who
16 could cash checks at Wells Fargo Banks.

17 6. Defendant BUTTS and a co-conspirator known to the Grand Jury
18 drove CARMICHAEL, CROMWELL, EPPS, and PIPPINS to various Wells Fargo
19 locations in the Eastern District of California and elsewhere to cash
20 the checks that had been prepared using the stolen customer information.
21 The co-conspirator known to the Grand Jury provided the checks to
22 defendants CARMICHAEL, CROMWELL, EPPS, and PIPPINS. Defendants
23 CARMICHAEL, CROMWELL, EPPS, and PIPPINS presented the checks for cash
24 at the Wells Fargo locations.

25 7. Each check provided by the co-conspirator known to the Grand
26 Jury to defendants CARMICHAEL, CROMWELL, EPPS, or PIPPINS was in the amount
27 of \$1,000.00. In most cases, consistent with bank security measures,
28 Wells Fargo tellers made telephone calls to the phone numbers listed in

1 Wells Fargo Bank's database in order to verify that such checks were
2 properly issued. An unknown co-conspirator receiving the call then
3 authorized payment to defendants CARMICHAEL, CROMWELL, and PIPPINS.

4 8. Defendants CARMICHAEL, CROMWELL, and PIPPINS received the
5 money from Wells Fargo. They then left the bank and met with the co-
6 conspirator known to the Grand Jury and defendant BUTTS, returning
7 majority of the money to the co-conspirator known to the Grand Jury
8 defendant BUTTS, and keeping some percentage for themselves.

9 OVERT ACTS

10 In furtherance of the conspiracy and to effect the objects thereof,
11 the following acts, among others, were committed by defendants JASMINE
12 NICOLE BUTTS, JASMINE CHANEL CARMICHAEL, EBONY CROMWELL, DARCEY EPPS
13 and TIFFANY CHARANADA PIPPINS, within the Eastern District of California
14 and elsewhere:

15 9. On June 15, 2007, defendant CROMWELL entered a Wells Fargo Bank
16 on Mount Diablo Road in Lafayette, California and cashed a check drawn
17 on the account of Gavino V.A. and Juana O.V. in the amount of \$5,138.00.

18 10. On July 10, 2007, defendant BUTTS and the co-conspirator known
19 to the Grand Jury drove defendant EPPS to a Wells Fargo Bank on
20 Courthouse Drive in Union City, California.

21 11. On July 10, 2007, defendant EPPS entered a Wells Fargo Bank on
22 Courthouse Drive in Union City, California and attempted to cash a check
23 drawn on the account of Leon and Germaine G. in the amount of \$3,722.00.

24 12. On July 18, 2007, defendant BUTTS paid \$79.00 in cash to man
25 a hotel room at the Silver Legacy Casino in Reno, Nevada.

26 13. On July 18, 2007, defendant CROMWELL entered a Wells Fargo
27 Bank on Neil Road in Reno, Nevada and cashed a check drawn on the
28 account of Peter A. in the amount of \$7,427.00.

1 14. On July 28, 2007, defendant BUTTS and the co-conspirator [REDACTED]
2 to the Grand Jury drove defendant CARMICHAEL to a Wells Fargo Bank on
3 Galleria Boulevard in Roseville, California, in the State and [REDACTED]
4 District of California.

5 15. On July 28, 2007, defendant CARMICHAEL entered Wells Fargo
6 Bank on Horseshoe Bar Road in Loomis, California, in the State of
7 Eastern District of California, and cashed a check drawn on the
8 of Carmen and Richard B. in the amount of \$2,135.00.

9 16. On or about August 8, 2007, the co-conspirator known to the
10 Grand Jury delivered counterfeit checks with stolen identifications and
11 information to defendant PIPPINS.

12 17. On August 8, 2007, defendant PIPPINS entered a Wells Fargo
13 Bank on East Horizon Ridge Parkway in Henderson, Nevada and cashed a
14 check drawn on the account of Gabriel and Daniel T. in the amount of
15 \$7,063.00.

16 All in violation of Title 18, United States Code, Section 373

COUNTS TWO THROUGH SIX: [18 U.S.C. § 1344(2) - Bank Fraud and Attempted Bank Fraud]

The Grand Jury further charges: T H A T

JASMIN NICOLE BUTTS, and
JASMINE CHANEL CARMICHAEL,

21 defendants herein, on or about the dates set forth below, in the 57th
22 and Eastern District of California, did each knowingly execute and
23 attempt to execute a scheme and artifice to obtain the monies and funds
24 owned by and under the custody and control of a federally insured
25 financial institution, to wit: Wells Fargo Bank, by means of material
26 false and fraudulent pretenses and representations, to wit: by the
27 use of forged checks, as set forth below. In executing the scheme to
28 defraud, a person known to the Grand Jury obtained counterfeit checks.

1 drawn on Wells Fargo Bank which had stolen names and account numbers
 2 information. The person known to the Grand Jury and defendant BUTTS
 3 then drove defendant CARMICHAEL to Wells Fargo Bank branches where
 4 defendant CARMICHAEL presented each such counterfeit check for cash as
 5 set forth below:

Count	Date	Amount	Payee	Account Holder
2	May 29, 2007	\$2,780.05	Jasmine Carmichael	Janice W.
3	July 28, 2007	\$5,829.00	Jasmine Carmichael	C. Family Trust
4	July 28, 2007	\$4,832.00	Jasmine Carmichael	Carmer and Richard B.
5	July 28, 2007	\$2,394.00	Jasmine Carmichael	C. Family Trust
6	July 28, 2007	\$2,135.00	Jasmine Carmichael	Carmer and Richard B.

14 All in violation of Title 18, United States Code, Sections 1344 (1) and
 15 2.

16 COUNTS SEVEN AND EIGHT: [18 U.S.C. § 1028A(a)(1) - Aggravated
 17 Identity Theft]

18 The Grand Jury further charges: T H A T

19 JASMIN NICOLE BUTTS, and
 20 JASMINE CHANEL CARMICHAEL,

21 defendants herein, on or about July 28, 2007, in the State and Eastern
 22 District of California, did each knowingly use, without lawful
 23 authority, a means of identification of another person, during and in
 24 relation to a felony violation of Federal law pursuant to Chapter 63
 25 Title 18, United States Code, to wit: bank fraud, in violation of 18
 26 United States Code, Sections 1344(2) and 2, as set forth below:

27 ///

28 ///

Count	Date	Felony Offense	Means of Identification Used
7	July 28, 2007	Fraudulent payment of \$4,832.00 to Jasmine Carmichael	Names of Carmen and Richard B.
8	July 28, 2007	Fraudulent payment of \$2,135.00 to Jasmine Carmichael	Names of Carmen and Richard B.

All in violation of Title 18, United States Code, Section 1028A(a) (1) and 2.

A TRUE BILL.

 [Redacted Signature]

FOREPERSON



McGREGOR W. SCOTT
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JASMIN NICOLE BUTTS,
JASMINE CHANEL CARMICHAEL,
EBONY CROMWELL,
DARCELL EPPS, and
TIFFANY CHARANDA PIPPINS

INDICTMENT

VIOLATION(S): 18 U.S.C. § 371 - Conspiracy; 18 U.S.C. § 1344(2)

- Bank Fraud and Attempted Bank Fraud (5 Counts); 18 U.S.C. §
1028A(a)(1) - Aggravated Identity Theft (2 Counts)

A true bill,

207-CR-0449 MC

151

Foreman.

Filed in open court this _____ day

of _____, A.D. 2007

Clerk:

*Bail \$ 0 pending hearing as to Butts + Carmichael, et al.
4/24/07*

GPO 863 525

*5/24/07
Piper*

PENALTY SLIP

DEFENDANTS: JASMIN NICOLE BUTTS
JASMINE CHANEL CARMICHAEL 2:07-CR-0449 MCE

COUNT 1: 18 U.S.C. § 371- Conspiracy

PENALTY: Not more than 5 years imprisonment,
Not more than \$250,000,
Term of 3 years supervised release.

COUNTS 2-6: 18 U.S.C. 1344 (2) - Bank Fraud and
Attempted Bank Fraud

PENALTY: Not more than 30 years imprisonment,
Not more than \$1,000,000,
Not more than 5 years supervised release

COUNTS 7 and 8: 18 U.S.C. § 1028A(a)(1) - Aggravated
Identity Theft

PENALTY: Not more than 2 years imprisonment consecutive,
Not more than \$250,000,
Term of 1 year supervised release

ASSESSMENT: \$100 each count.

PENALTY SLIP

DEFENDANT: **EBONY CROMWELL**
DARCELL EPPS
TIFFANY CHARANADA PIPPINS

207-CR-0449-BK

COUNT 1: 18 U.S.C. § 371 - Conspiracy

PENALTY: Not more than 5 years imprisonment,
Not more than \$250,000
Term of 3 years supervised release.

ASSESSMENT: \$100 each count.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

1394115

USA,

v₁

WARRANT FOR ARREST

JASMIN NICOLE BUTTS,

Case Number: 2:07-CR-00449-MCE

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To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest **Jasmine Nicole Butts**
and bring him or her forthwith to the nearest magistrate judge to answer a(n)

Indictment Information Violation Petition Other

charging him or her with (brief description of offense)

Conspiracy

in violation of Title 18

United States Code, Section(s) 371

- D. Duong

Name of Issuing Officer

Deputy Clerk

Title of Issuing Office

10/4/07 Sacramento

Date and Location

Bail fixed at \$No Bail

by Judge Kimberly J. Mueller

RETURN

This warrant was received and executed with the arrest of the above-named defendant.

RETURN	
This warrant was received and executed with the arrest of the above-named defendant	
Date Received	Name and Title of Arresting Officer
Date of Arrest	Signature of Arresting Officer